

REQUEST FOR EARLY EFFECTIVE DATE

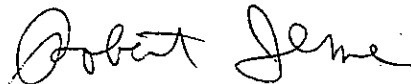
Pursuant to Government Code section 11343.4, the Air Resources Board (ARB) requests that the amendment of sections 94500-94506, 94508, and 94521, Title 17, California Code of Regulations (CCR), become effective upon filing with the Secretary of State. Good cause for this request exists.

The amendments make a number of important changes to the ARB consumer products regulations. The amendments to the antiperspirant and deodorant regulation address competitiveness concerns raised by consumer products manufacturers (i.e., to "level the playing field" for all manufacturers). The amended volatile organic compound (VOC) definitions in the consumer products regulations reflect recent actions by the United States Environmental Protection Agency (U.S. EPA) to exempt additional compounds from the federal VOC definition. The amendments add new compounds to the list of compounds that are not considered VOCs, and will increase manufacturers' formulation flexibility without compromising air quality.

An early effective date is necessary to allow manufacturers of consumer products to utilize these changes as soon as possible. Manufacturers are currently in the process of reformulating their products to comply with the ARB's VOC regulatory standards. Manufacturers have expressed great interest in quickly utilizing the amended provisions to manufacture and market reformulated products. An early effective date will facilitate this process.

In addition to the above considerations, an early effective date will assure that the ARB receives necessary reporting data on antiperspirants and deodorants. Under the amendments (section 94504(b), Title 17, CCR), this data must be reported to the ARB by March 1 of each year. Manufacturers have been asking if this requirement will be applicable for 1996, if the amendments do not become legally effective until after March 1, 1996. An early effective date will reduce such confusion and insure that the ARB receives the data in a timely manner.

Date: January 17, 1996



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